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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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APR 12 2005

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Amendment of Section 73.202(b),)
Table of Allotments,)
FM Broadcasting Stations,)
(Richlands, Shallotte, Topsail Beach, and)
Wrightsville Beach, North Carolina))
)

MB Docket No. 05-16

RM-11143

DOCKET FILE COPY ORIGINAL

To: The Office of the Secretary
Attn: Assistant Chief, Audio Division, Media Bureau

**MOTION FOR LEAVE TO FILE PROCEDURAL RESPONSE
TO REPLY COMMENTS**

Conner Media Corporation ("Conner"), by its attorney, hereby respectfully requests leave to file a limited response to one procedural aspect of the April 5, 2005 "Reply Comments" filed by Sea-Comm, Inc. ("Sea-Comm") in the captioned matter.

Sea-Comm begins its Reply Comments with a claim that Conner's March 21, 2005 Comments and Counterproposal were untimely filed and therefore must be disregarded. Unless the response proffered herewith is taken into consideration, then Conner will have had no opportunity to respond to Sea-Comm's erroneous assertions. Upon acceptance of Conner's Counterproposal, the Commission staff routinely will set a new set of dates for reply comments, but if the relief requested by Sea-Comm were to be granted, then Conner would have no opportunity to demonstrate that its Counterproposal in fact was timely and should indeed be entitled to further processing. Consequently, the only meaningful opportunity for Conner to address this threshold matter is through the mechanism of relief requested herein, in which it is demonstrated that Conner's submission was indeed timely.

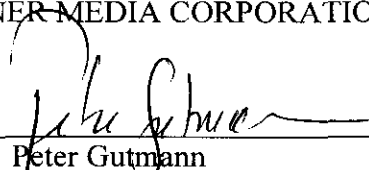
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In view of the foregoing, Conner respectfully requests leave to file the "Procedural Response to Reply Comments" proffered herewith.

Respectfully Submitted,

CONNER MEDIA CORPORATION

By


Peter Gutmann
Its Attorney

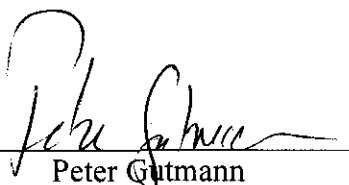
Womble Carlyle Sandridge & Rice, PLLC
1401 I Street, NW., Seventh Floor
Washington, DC 20005
(202) 857-4532

April 12, 2005

CERTIFICATE OF SERVICE

I, Peter Gutmann, an attorney at the law firm of Womble Carlyle Sandridge & Rice, PLLC, do hereby certify that true copies of the foregoing "Motion for Leave to File Procedural Response to Reply Comments" were mailed, postage prepaid on this 12th day of April, 2005, to the following:

John Griffith Johnson, Jr., Esquire
Paul, Hastings, Janofsky & Walker, LLP
1299 Pennsylvania Avenue, NW
Tenth Floor
Washington, DC 20004-2400
(Counsel for Sea-Comm, Inc.)


Peter Gutmann